

TSD File Inventory Index

Date: January 24, 2001

Initial: CMG/raa

Facility Name: <u>ITT Harper (Meriton Home Facility - On Field Site)</u>			
Facility Identification Number: <u>ILD 005211 545</u>			
A.1 General Correspondence	Y	B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	Y
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	Y
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify in individual fields per schedule!

**A.1 Public
Participation**

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE U.S. Environmental Protection Agency, WMB.		For Agency Use Only
PLACE VOUCHER PREPARED 230 S. Dearborn, Chicago, Ill. 60604		VOUCHER NUMBER
NAME OF PUBLICATION Melcon Grove Champion		SCHEDULE NUMBER
NAME OF PUBLISHER OR REPRESENTATIVE David Simonson		PAID BY
ADDRESS (Street, room number, city, State, and ZIP code) Legal Nogice Department 9-251-4300 Pioneer Press, 130 S. Prospect, Part Ridge, Ill 60068		
DATE PREPARED 9/17/81		

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)
POINT PER			
Line Rates	NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
FIRST INSERTION		\$	\$
ADDITIONAL INSERTIONS GIVE NUMBER ▶			
TOTAL			\$
Other Rates	NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
FIRST INSERTION		\$	\$
ADDITIONAL INSERTIONS GIVE NUMBER ▶			
TOTAL			\$
At one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.		TOTAL LINE RATES AND OTHER RATES	
		LESS DISCOUNT AT %	
		BALANCE DUE \$	
		VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE _____

TITLE _____ DATE _____

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION <div style="text-align: right; margin-top: 10px;"> EST 10.00 <i>OK for JAK Chief RAIS</i> </div>	PAID BY CHECK NUMBER

* If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here

ADVERTISING ORDER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR CE

ORDER NUMBER

U.S. Environmental Protection Agency

DATE 9/17/81

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

Morton Grove Champion

SUBJECT OF ADVERTISEMENT

Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED

Thursday

NUMBER OF TIMES ADVERTISEMENT APPEARED

1

DATE(S) ADVERTISEMENT APPEARED

October 8, 1981

SPECIFICATIONS FOR ADVERTISEMENT

Please place notice in legal notice section.

COPY FOR ADVERTISEMENT

AUTHORITY TO ADVERTISE

INSTRUMENT OF ASSIGNMENT

NUMBER

NUMBER

DATE

DATE

SIGNATURE OF AUTHORIZING OFFICIAL

TITLE

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC.
D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 3:00 p.m., November 16, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.



ITT Harper 

*A Division of
International Telephone and Telegraph Corporation*

*8200 Lehigh Avenue
Morton Grove, Illinois 60053
(312) 966-6000 Telex 724-464*

October 5, 1981

Mr. Tom Golz
USEPA
230 S. Dearborn Street
Chicago, Illinois 60604

Dear Tom,

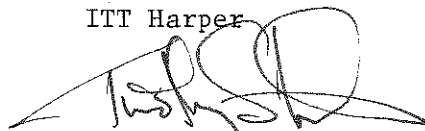
Attached, for your convenience, is a copy of the cover letter and proposed public notice your office recently submitted to me. Per our phone conversation of October 5, 1981, I would like to bring your attention to the fact that the surface impoundment to be closed does not contain any pickle liquor residues. It does however, contain contact cooling water used as part of a recirculating cooling system.

Please see that this is corrected on the public notice and in your file so the aspects of this closure are properly represented.

If there are any further questions, or if I can be of any further service, please do not hesitate to contact me directly. As always, we will continue to keep you informed of any pertinent events.

Sincerely,

ITT Harper



Timothy S. Milo
Plant Engineer

TSM/jlw
Encl.



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5AHWM

9 1 OCT 1981

Tim Milo, Plant Engineer
ITT-Harper
8200 Lehigh Avenue
Morton Grove, Illinois 60053

Dear Mr. Milo:

Enclosed, per our recent phone conversation, is a copy of the public notice on your facility's closure of its surface impoundment. The notice is scheduled to appear on October 8, 1981, in the Morton Grove Champion.

Mr. Cho and I have completed our reviews of the closure plan and anticipate its approval upon closure of the public comment period.

Sincerely,

A handwritten signature in cursive script, reading "Thomas B. Golz", is written over the typed name.

Thomas B. Golz
Environmental Scientist

Enclosure



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

RAIS

REPLY TO ATTENTION OF:
5AHWM

9 2 OCT 1981

Tim Milo, Plant Engineer
ITT-Harper
8200 Lehigh Avenue
Morton Grove, Illinois 60053

12D005211545

Dear Mr. Milo:

Enclosed, per our recent phone conversation, is a copy of the public notice on your facility's closure of its surface impoundment. The notice is scheduled to appear on October 8, 1981, in the Morton Grove Champion.

Mr. Cho and I have completed our reviews of the closure plan and anticipate its approval upon closure of the public comment period.

Sincerely,

Thomas B. Golz
Environmental Scientist

Enclosure

Green Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: AUG 18 1981

SUBJECT: Attached Proposed Notice-Closure Plan
ITT Harper, Morton Grove

FROM:
FROM: Hak Cho, Chief
State Technical Unit #1

THRU: Eugene Meyer, Chief
Technical Programs Section

TO: Judy Kerttner, Chief
Regulatory Analysis Section

The attached public notice advises the public of availability of
the closure plan for the above facility, EPA ID# ILD005211545.

The plan proposes to remove a surface impoundment containing spent
pickle liquor from steel finishing, EPA hazardous waste No. K062, in
its entirety. The plan calls for neutralization and offsite disposal
of 5000 gallons of sludge and 200 cubic yards of lines and contaminated
soils.

Attachment

5A&HWM:TOM GOLZ:A.SUTTON:8/18/81:6-7482

INITIALS DATE	TYPIST	AUTHOR	PEU CHIEF	STU #1 CHIEF	STU #2 CHIEF	TPS CHIEF	WMD CHIEF	ADMIN DIRECTOR
	<i>As</i> 8/18/81	<i>JMB</i> T.G. 8/18/81		<i>JMB</i> JHC 8/18/81		<i>sin</i> 8/18/81		

PUBLIC NOTICE

The United States Environmental Protection Agency (USEPA) announces the receipt of a hazardous waste facility closure plan submitted under the Resource Conservation and Recovery Act (RCRA). ITT-Harper, 8200 Lehigh Avenue, Morton Grove, Illinois, will close a hazardous waste surface impoundment. The plan submitted on May 18, 1981, proposes the excavation and off site disposal of 5000 gallons of hazardous waste residues, and an estimated 200 cubic yards of impoundment liner and underlying soils. No hazardous waste will remain upon closure.

The plan is available for public inspection between 10:00 a.m. and 4:00 p.m., Monday - Friday at USEPA Region V Library, 230 South Dearborn, 14th Floor Chicago, Illinois 60604.

Comments on the plan may be submitted to:

U.S. EPA
Waste Management Branch
Attn: RAIS
230 South Dearborn
Chicago, Illinois 60604

PUBLIC NOTICE

The United States Environmental Protection Agency (USEPA) announces the receipt of a hazardous waste facility closure plan submitted under the Resource Conservation and Recovery Act (RCRA). ITT-Harper, 8200 Lehigh Avenue, Morton Grove, Illinois, will close a hazardous waste surface impoundment. The plan submitted on May 18, 1981, proposes the excavation and off-site disposal of 5,000 gallons of hazardous waste residues, and an estimated 200 cubic yards of impoundment liner and underlying soils. No hazardous waste will remain upon closure.

The plan is available for public inspection between 10:00 a.m. and 4:00 p.m., Monday - Friday at USEPA Region V Library, 230 South Dearborn, 14th Floor, Chicago, Illinois 60604

Comments on the plan may be submitted to:

U.S. Environmental Protection Agency
Waste Management Branch
ATTN: RAIS
230 South Dearborn
Chicago, Illinois 60604

PUBLIC NOTICE

The U.S. Environmental Protection Agency (U.S. EPA) has received a request from ITT Harper to close its surface impoundment at 8200 Lehigh Road, Morton Grove, Illinois. The plan submitted on May 18, 1981, proposes the excavation and off-site disposal of 5000 gallons of spent pickle liquor residues and an estimated 200 cubic yards of impoundment liner and underlying soils. No hazardous waste will remain upon closure.

The ITT Harper request is sought under the rule on Hazardous Waste Management Facility closure (40 CFR 265. Subpart G) which appeared in the Federal Register, January 12, 1981, under the authority of the Resource Conservation and Recovery Act. This application will be evaluated by U.S. EPA according to the criteria set forth in the above rule.

A copy of the plan and related background materials can be seen at the U.S. Environmental Protection Agency, Waste Management Branch, 111 West Jackson, Chicago, Illinois, from 8:30 a.m. to 4:30 p.m., Monday through Friday.

Public comments concerning this application are requested by U.S. EPA, and will be accepted through November 7, 1981. Please send comments to:

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

OR# ILD 005211545

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ LD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO:
Tim Milo
ITT Harper

FROM:
April Katsura
RAIU

DATE 7/27/82

TIME 2 p.m.

SUBJECT
Confidentiality claim for their Part A ILD005211545

SUMMARY OF COMMUNICATION

Mr. Milo confirmed that ITT did not intend to make a claim of confidentiality at the time they submitted their Part A. The envelope on which they had checked "LEGAL CONFIDENTIAL" was for mailing purposes and not for use in making in a claim.

Confidentiality claim denied by Office
of Regional Counsel 6-30-82

CONCLUSIONS, ACTION TAKEN OR REQUIRED

This application will now be processed as a non-confidential application.

INFORMATION COPIES

TO: H. Cho, M. Gade

A.2 Part A/
Interim Status



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

Mr. Timothy Milo, Plant Engineer
ITT Harper, a Div. of ITT
8200 Lehigh Ave.
Morton Grove, Illinois 60053

RCRA ACTIVITIES

RE: Interim Status Acknowledgement
FACILITY NAME: ITT Harper a Division of ITT

USEPA ID No. IL D005211545

Dear Mr. Milo:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for interim status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for interim status. Our opinion will be reevaluated on the basis of this information.

The State of Illinois has received Phase I interim authorization under Section 3006 of RCRA. Because of this authorization you are required to comply with standards prescribed in 35 Illinois Administrative Code, Subtitle G, Chapter I, Subchapter c, Part 725, in lieu of the standards in 40 CFR 265. In addition, you are reminded that operating under interim status does not relieve you of the need to comply with other applicable Federal, State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from the Part A permit application that was sent to USEPA. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR 122.23 and as State regulations allow.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR 122.23; your facility may operate under interim status until such time as an RCRA permit is issued or denied. This will be preceded by a request from this office or the Illinois Environmental Protection Agency for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

If you have questions concerning the Illinois hazardous waste regulations, please contact Mr. Robert Kuykendall at the Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. His phone number is (217) 782-6760.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: E. T. Vogel, President

ITT Harper Division

IL D00521.1545

ITT Harper Division

ITT Harper Division

8200 Lehigh Ave..
Morton Grove, IL 60053

DESIGN CAPACITY

UNIT OF MEASURE

T01

250,000

U

S01

18,100

G

S02

200,000

G

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE	UNIT OF MEASURE	CODE
STORAGE:				
CONTAINER	S01	G or L	GALLONS	G
TANK	S02	G or L	LITERS	L
WASTE PILE	S03	Y or C	CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G or L	CUBIC METERS	C
DISPOSAL:			GALLONS PER DAY	U
			LITERS PER DAY	V
			TONS PER HOUR	D
			METRIC TONS/HOUR	W
INJECTION WELL	D79	G,L,U, or V	GALLONS/HOUR	E
LANDFILL	D80	A or F	LITERS/HOUR	H
LAND APPLICATION	D81	B or Q	ACRE-Feet	A
OCEAN DISPOSAL	D82	U or V	HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G or L	ACRES	B
TREATMENT:			HECTARES	Q
			POUNDS/HOUR	J
TANK	T01	U or V	KILOGRAMS/HOUR	R
SURFACE IMPOUNDMENT	T02	U or V	TONS PER DAY	N
INCINERATOR	T03	D,W,E, or H	METRIC TONS/DAY	S
OTHER	T04	U,V,J,R,N, or S		

5HW-TUB

DEC 23 1983

Mr. Thomas Cavanagh, Manager
Permits Section, DLPC
Illinois EPA
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Cavanagh:

I am herewith transferring the items listed below for your Agency for processing in accordance with the Phase I interim authorization agreement.

Closure plan and closure cost estimate for ITT Harper 8200 Lehigh Avenue
Morton Grove, Illinois. ILD 005211545

Your efforts on these matters are appreciated. Please contact Mr. Robert Stone of my staff, at (312) 886-6151, if you need more information.

Sincerely,

William H. Miner, Chief
Technical, Permits, and Compliance Section

Enclosures

bcc: Part A file for each item
Chuck Lewis

5HW-TUB:B.Stone:ad 12/17/82

pp 12/22/82

INITIALS	DATE	TYPYST A.P. 12-17-82	AUTHOR P.L. 12-20-82	PEU CHIEF	STU #1 CHIEF J.G.W. 12/20/82	STU #2 CHIEF	TPS CHIEF W.H.M. 12/21/82	WMB CHIEF	AHMD DIRECTOR
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July 20, 1982

Request for copies of Part A files

R.L. Stone, SIO(IL)

RAIU/Versar

THRU: H. Witschogke

~~PLEASE~~ make a copy of each of the following Part A Application for
Illinois Environmental Protection Agency:

✓ ITT-Harper, Morton Grove, IL
ILD 005 211 545

Joliet Army Ammunition Plant, Joliet, IL
IL7213820460

Texaco, Lockport, IL
ILD 041 518 ~~218~~ 861

Please mail the copies to IEPA using the attached mailing table, since
I will be on leave until August 16. Thank you.

R.Stone:rita:5HW-TUB:7-22-82:6-7444

	TYPIST	AUTHOR	TEO CHIEF	STU #1 CHIEF	STU #2 CHIEF	TPS CHIEF	WMB CHIEF	AHMD DIRECTOR
INITIALS	Rita	RJS		HW				
DATE	7-22-82	7-22-82		7/22/82				

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F 1 L D 0 0 5 2 1 1 5 4 5	
II. POLLUTANT CHARACTERISTICS		III. NAME OF FACILITY 1 SKIP ITT HARPER A DIVISION OF ITT		IV. FACILITY CONTACT 2 MILO TIMOTHY PLANT ENGINEER 312 966 6000	
V. FACILITY MAILING ADDRESS 3 8200 LEHIGH AVE		VI. FACILITY LOCATION 5 8200 LEHIGH AVE		VII. COUNTY CODE 6 MORTON GROVE IL 60053	
VIII. FACILITY MAILING ADDRESS 4 MORTON GROVE		IX. FACILITY LOCATION 6 MORTON GROVE		X. COUNTY CODE IL 60053	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	3	4	5	7	3	3	9
(specify) Bolts, Nuts, etc.				(specify) Primary Metal Products			
C. THIRD				D. FOURTH			
7	3	3	1	7	3	4	9
(specify) Steel Pipes & Tubes				(specify) Screw Machine Products			

VIII. OPERATOR INFORMATION

A. NAME															B. Is the name listed in Item VIII-A also the owner?	
8 I T T H A R P E R A D I V I S I O N O F I T T															<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)	
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) Private															3 1 2 9 6 6 6 0 0 0	
E. STREET OR P.O. BOX																
8 2 0 0 L E H I G H A V E																
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND		
B M O R T O N G R O V E										I L		6 0 0 5 3		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N I L 0 0 3 4 8 5 1										9 P N O N E									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U N O N E										* * * (specify) * See Attachment B									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R N O N E										* * * (specify) * See Attachment B									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE FASTENERS, AND EXTRUDED SHAPES

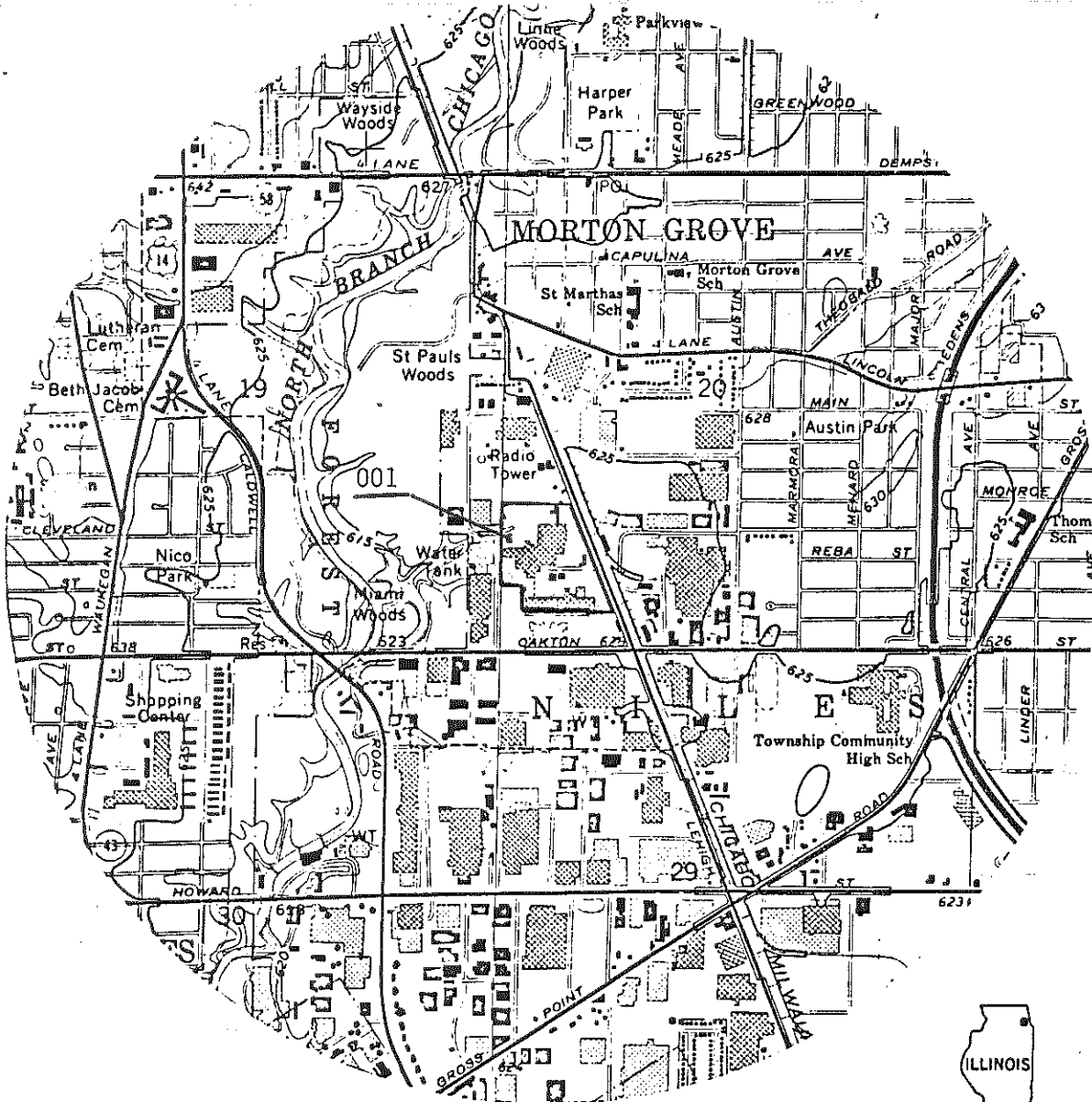
XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

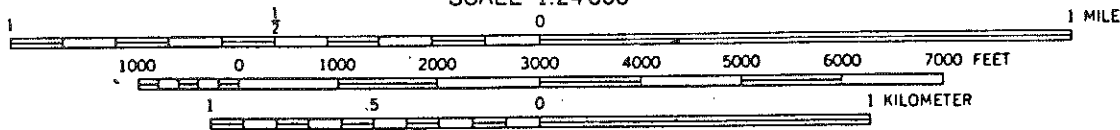
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
E. T. Vogel	E. Thomas Vogel	5/18/81

COMMENTS FOR OFFICIAL USE ONLY

C



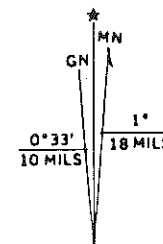
SCALE 1:24 000



CONTOUR INTERVAL 5 FEET
DATUM IS MEAN SEA LEVEL

Notes:

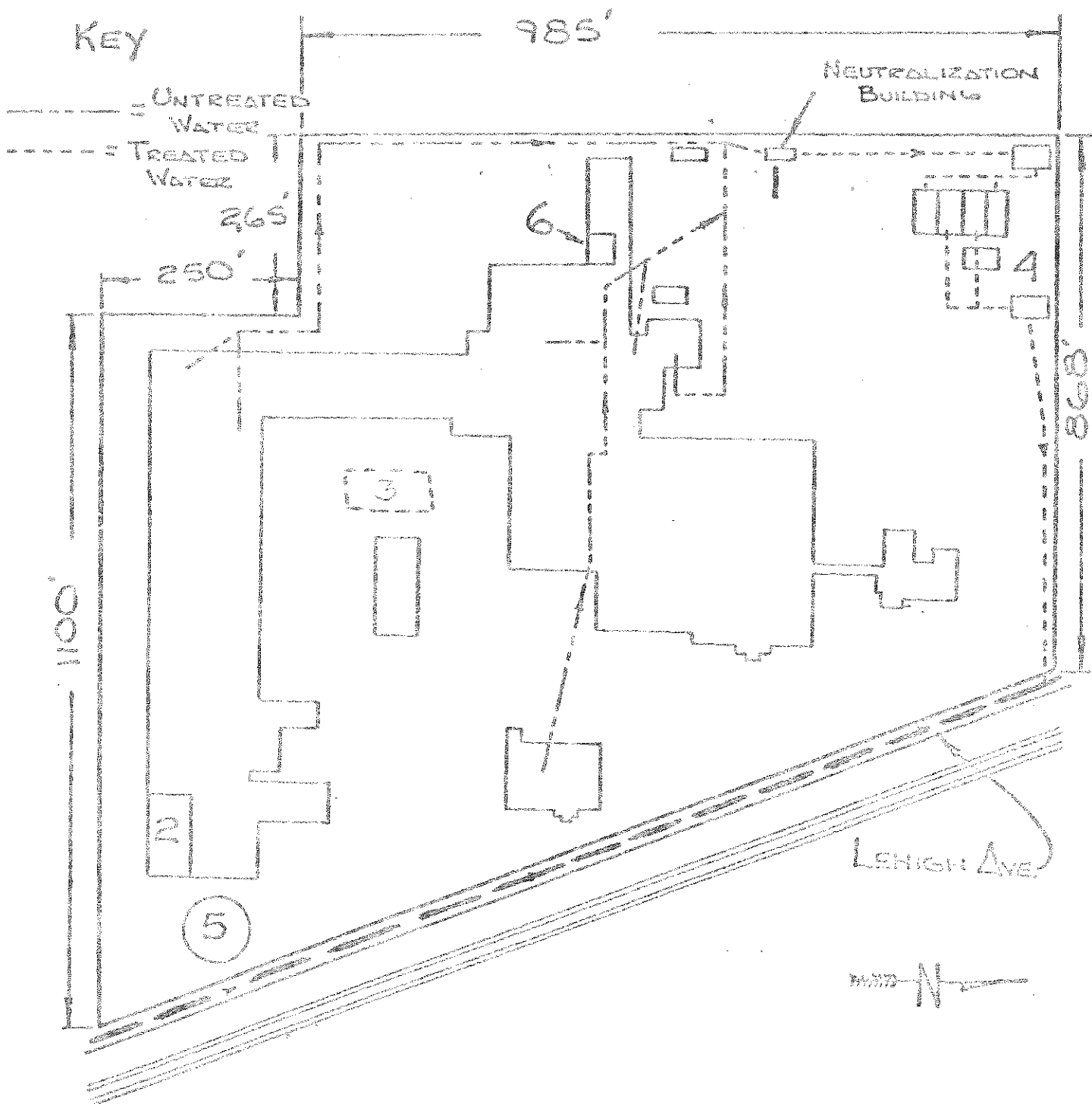
- 001 indicates a storm water and non-contact cooling water outfall per NPDES Permit #IL0034851 which empties into the North Branch of the Chicago River.
- The North Branch of the Chicago River flows to the South.
- Location of ITT Harper to nearest second is $42^{\circ} 02' 30''$ N, $87^{\circ} 46' 02''$ W.
- A copy of page 5 from Part 3 of this application is attached to better illustrate the exact locations of each hazardous waste Management Facility.



TAKEN FROM
PARK RIDGE, ILL.
N4200—W8745/7.5

1963
PHOTOREVISED 1972
AMS 3468 III SE—SERIES V883

UTM GRID AND 1972 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET



1. Neutralization Treatment Building.
2. Bag Houses and Bag House Dust Storage.
3. Spent 1,1,1-Trichloroethane Drum Storage.
4. Lime Sludge Tank Storage and Controls.
5. Recirculating Quench Water in a Surface Impoundment.
6. Past Storage Area - Kolene Salt Sludge.

----- Industrial Wastewater Sewer System
 - - - - - Chicago Metropolitan Sanitary District Sewer System

SCALE = $\frac{1}{2}" = 100'$

10/31/80

NOTE: UPON CLOSURE AREA 5 WILL BECOME A PAST STORAGE AREA.

DMC

ATTACHMENT A

Illinois NPDES Permit #IL0034851

Effective Date: August 16, 1980

Expiration Date: May 1, 1985

During a phone conversation with Mr. Cho of the US EPA region V office in Chicago, Mr. Cho confirmed that since the above mentioned NPDES permit had just recently been renewed for a term of 5 years, it was not necessary to file Form 2C as part of this application. Instead, this note and a copy of the current NPDES Permit are attached.

10/1/80

NPDES Permit No. IL0034851

Illinois Environmental Protection Agency

Division of Water Pollution Control

2200 Churchill Road

Springfield, Illinois 62706

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date: May 1, 1985 Issue Date: July 16, 1980
Effective Date: Aug. 16, 1980

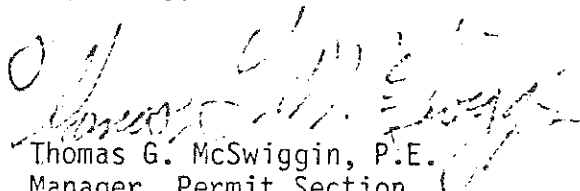
Permittee: ITT Harper, A Division of International
Telephone and Telegraph Corp.

Facility Name and Address: ITT Harper, A Division of International
Telephone & Telegraph Corp., 8200 LeHigh
Avenue, Morton Grove, Illinois 60053,
Cook County

Receiving Waters: The North Branch of the Chicago River

In compliance with the provisions of the Illinois Environmental Protection Act, the Chapter 3 Rules and Regulations of the Illinois Pollution Control Board, and the FWPCA, the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.


Thomas G. McSwiggin, P.E.
Manager, Permit Section
Division of Water Pollution Control

TGM:LWE:YVS:dkr:sp/3149b

NPDES Permit No. IL0034851

Effluent Limitations and Monitoring

Discharge Number(s): 001

Discharge Name(s): Noncontact Cooling Water and Stormwater

From effective date of permit until the expiration date of the Permit, the effluent of the above discharge(s) shall be monitored and limited at all times as follows:

PARAMETER	CONCENTRATION LIMITS mg/l			LOAD LIMITS lbs/day (Kg/day)			SAMPLE FREQUENCY IF DISCHARGE OCCURS	SAMPLE TYPE
	30 DAY	7 DAY	DAILY	30 DAY	7 DAY	DAILY		
	AVG.	AVG.	MAX.	AVG.	AVG.	MAX.		
Flow (MGD)							Measure When Monitoring	
pH	See Attachment B Continued						1/Month	Grab
Temperature	See Attachment B Continued						1/Month	Grab
Oil, Fats & Grease	15		30				1/Month	Grab

- [REDACTED]
1. The pH shall be in the range 6.0 to 9.0.
 2. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.
 3. For the purpose of this permit this discharge is limited solely to noncontact cooling water and stormwater free from any other waste water discharges.
 4. The permittee shall record monitoring results on Discharge Monitoring Report Forms using one such form for each discharge each month.

Discharge Monitoring Reports shall be mailed to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Attention: NPDES Unit (DMR)

Compliance Assurance Unit
original & one copy -

5. The completed Discharge Monitoring Report forms shall be retained by the permittee for a period of six months and then shall be mailed and received by the IEPA in accordance with the following schedule, unless otherwise specified by the permitting authority.

Period

Received by IEPA

March, April, May, June, July, August

September 15

September, October, November, December,
January, February

March 15

ATTACHMENT B

Additional Environmental Permits

Illinois Special Waste Disposal Permits

#998686 - Hauling of Chlorinated Solvent for Reclaim

#998263 - Hauling of Waste Oil for Reclaim

#781452 - Hauling and Disposal of Stamping Parts Rinse

#997603 - Same as #781452, but for Reclaim

#781522 - Hauling and Disposal of Metal Hydroxide Sludge.

Air Permits

Illinois EPA #02090095 - Entire Plant and Arc Furnaces

Illinois EPA #72111515 - Preheat Furnace

Illinois EPA #04100068 - Sauder Annealing Furnace

Cook County #093215 - Entire Plant

10/1/80

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES — FOR DESCRIBING OTHER PROCESSES (code "T00"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

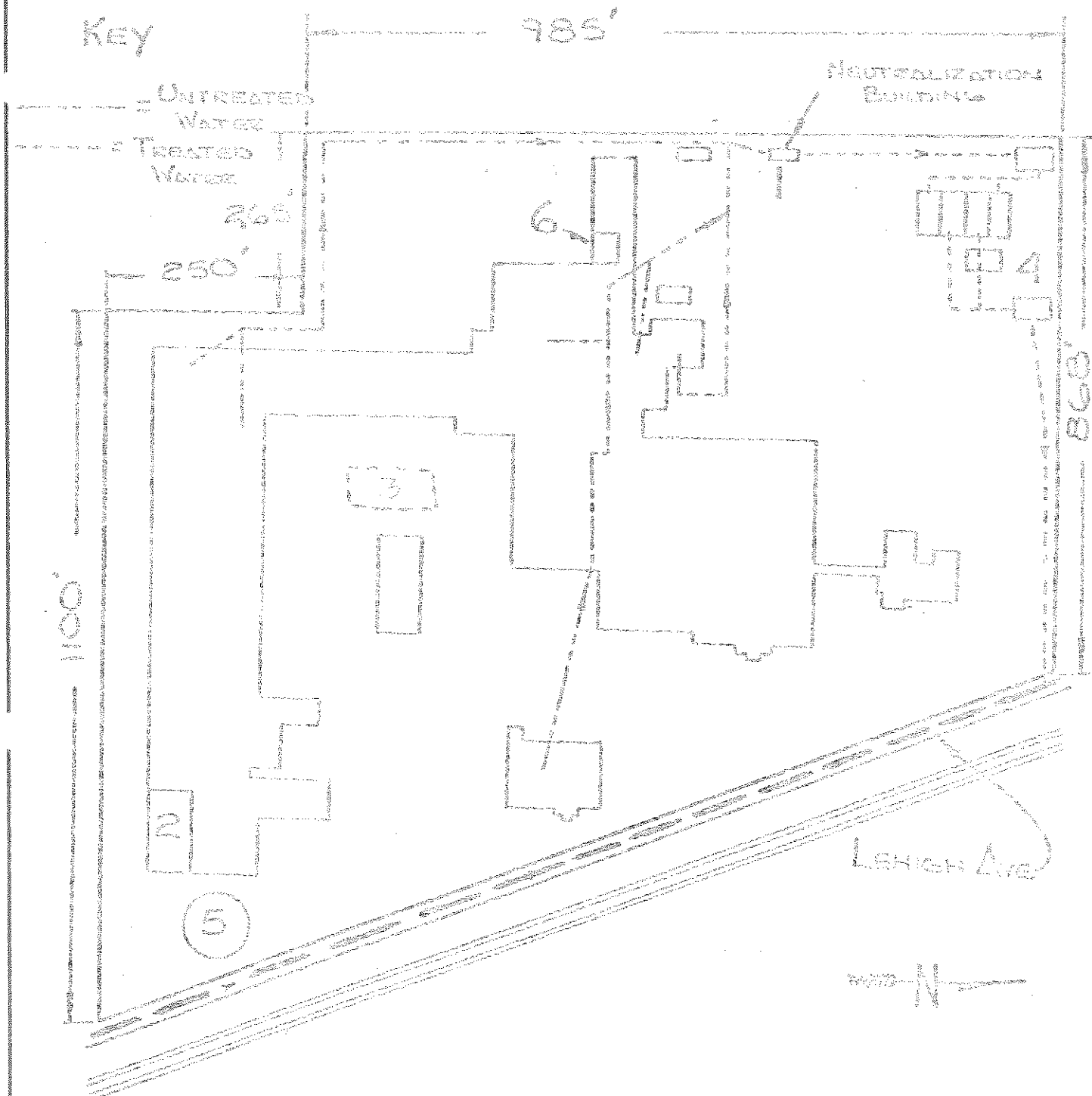
NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

V. FACILITY DRAWING (see page 4)



1. Neutralization Treatment Building.
2. Bag Houses and Bag House Dust Storage.
3. Spent 1,1,1-Trichloroethane Drum Storage.
4. Lime Sludge Tank Storage and Controls.
5. Recirculating Quench Water in a Surface Impoundment.
6. Past Storage Area - Roloce Salt Sludge.

----- Industrial Wastewater Sewer System
 - - - - - Chicago Metropolitan Sanitary District Sewer System

SCALE = 1/2" = 100'

10/31/80

DMO

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY																							
S W 1 L D 0 0 5 2 1 1 5 4 5 T/A C 1															S W DUP T/A C 2 DUP																							
1 2 13 14 15															1 2 13 14 15 23 26																							
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																																						
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	D. PROCESSES																												
										1. PROCESS CODES (enter)																												
	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60
1	K	0	6	2	300,000				T						T	0	1	S	0	2																		
2	D	0	0	0																																	Included with above	
3	D	0	0	2																																	Included with above	
4	F	0	1	0																																	Included with above	
5	F	0	1	1																																	Included with above	
6	K	0	6	3	1,250				T						S	0	2																					
7	K	0	6	1	30				T						S	0	1																					
8	F	0	1	2																																	Included with above	
9	F	0	0	1	60				T						S	0	1																					
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IV. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

* ITEM VI - See Attachment C

EPA I.D. NO. (enter from page 1)

S	F	I	L	D	0	0	5	2	1	1	5	4	5	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

* All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

42 02 30 N

LONGITUDE (degrees, minutes, & seconds)

087 46 02 W

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

E. T. Vogel

B. SIGNATURE

E. Thomas Vogel

C. DATE SIGNED

5/18/81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

E. T. Vogel

B. SIGNATURE

E. Thomas Vogel

C. DATE SIGNED

5/18/81

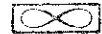
ATTACHMENT C

UPDATED PHOTOS OF THE SURFACE IMPOUNDMENT AREA AFTER CLOSURE,
WILL BE FORWARDED UPON COMPLETION OF THE CLOSURE PLAN.



ENVIRONMENTAL CONTROL MANUAL

ITT Harper



A Division of
International Telephone
and Telegraph Corporation

CLOSURE PLANS FOR SURFACE IMPOUNDMENT

- I. Upon making the decision to close the rolling mill cooling pond surface impoundment, the following actions will be taken.
 - A. Closure cost estimate will be reviewed.
 - B. A copy of the closure cost estimate and closure plans, and a revised RCRA permit application reflecting the closure will be forwarded to EPA atleast 180 days prior to the intended closure date. A letter of intent stating the closure date shall accompany the above.
 - C. ITT Midwest Legal shall be contacted to review and comment on the above documents prior to EPA submittal.
- II. Upon receipt of written approval from E.P.A., the surface impoundment will be closed; adhearing to the following plan.
 - A. All standing liquid in the impoundment will be removed by pumping into Harpers industrial treatment system. The Q.C. Dept. will be notified so additional analyses of treated effluent can be made.
 - B. All underlying soil including the clay liner, will be removed to a depth where no contamination exists. Removed material will be disposed of in a secured landfill.
 - C. As all contaminated material will be removed from the surface impoundment, and all underlying soil will be excavated & disposed of, a leachate collection system, or ground water monitoring system is not necessary.
 - D. Excavated area will be backfilled and graded to prevent run-on or pooling.
 - E. As all hazardous constituents will be removed (per item C above), capping the area with an impervious membrane will not be required.
 - F. Site restoration will include topsoil layer, and sodding or seeding as required.
 - G. This area is located within Harpers perimeter fencing, therefore, additional security fencing is necessary.
 - H. As all contaminated material will be removed from the surface impoundment, and all underlying soil will be excavated and disposed of, and further since the impoundment is located totally within Harpers property lines, no financial liability is anticipated, and no post closure care is needed.

Revision

Effective Date

Authorization

Page



ENVIRONMENTAL CONTROL MANUAL

ITT Harper



A Division of
International Telephone
and Telegraph Corporation

CLOSURE COST ESTIMATE FOR SURFACE IMPOUNDMENT

I.	Lab Analysis	500.00
II.	Disposal of Standing Liquid & Sludge	
	A. Labor (Maint. & Q.C.) = 60 hrs. @ 16.50/hr.	1000.00
	B. Neutralizing Agents	800.00
	C. Sludge Disposal = 5,000 gal. sludge @ \$.20/gal.	1000.00
III.	Disposal Underlying Soil & Liner	
	A. Excavation Labor = 200 yards ³	2500.00
	B. Hauler Costs = 20 loads at 10 yds ³ /load X \$350.00 per trip	7000.00
	C. Disposal Fees = 200 yards ³ X \$30.00/yd. ³	6000.00
IV.	Site Restoration	
	A. Backfill & Compact - Labor	2000.00
V.	Professional Services	2000.00
VI.	Contingencies	2200.00
		<hr/>
		\$25000.00

Revision

Effective Date

Authorization

Page

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F 1 L D 0 0 5 2 1 1 5 4 5	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS									
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.									
SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS		MARK 'X'			
		YES	NO	FORM ATTACHED			YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)			X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)					D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)			X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)			X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X	

III. NAME OF FACILITY									
1	SKIP	I T T H A R P E R A D I V I S I O N O F I T T							

IV. FACILITY CONTACT														
A. NAME & TITLE (last, first, & title)					B. PHONE (area code & no.)									
2	M I L O T I M O T H Y P L A N T E N G I N E E R				3	1	2	9	6	6	6	0	0	0

V. FACILITY MAILING ADDRESS											
A. STREET OR P.O. BOX											
3	8 2 0 0 L E H I G H A V E										
B. CITY OR TOWN					C. STATE	D. ZIP CODE					
4	M O R T O N G R O V E				I	L	6	0	0	5	3

VI. FACILITY LOCATION														
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER														
5	8 2 0 0 L E H I G H A V E													
B. COUNTY NAME														
C. CITY OR TOWN					D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)							
6	M O R T O N G R O V E				I	L	6	0	0	5	3	0	3	1

VII. SIC CODES (4-digit, in order of priority)

VIII. OPERATOR INFORMATION

☒ X. EXISTING ENVIRONMENTAL PERMITS

XI. MAP If there is at least one mile beyond property boundaries. The map must show

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE FASTENERS, AND EXTRUDED SHAPES

XIII. CERTIFICATION (see instructions)

COMMENTS FOR OFFICIAL USE ONLY

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			FIELD 005211545											

FOR OFFICIAL USE ONLY										COMMENTS
APPLICATION APPROVED		DATE RECEIVED (yr., mo., & day)								
23		24								29

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)									
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)									
<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)									
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (See the boxes to the left)									
FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN									

B. REVISED APPLICATION (place an "X" below and complete Item I above)									
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS									
<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT									

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS		T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S										T/A C									
C										1									
1 2										13 14 15									
LINE NUMBER										LINE NUMBER									
A. PRO- CESS CODE (from list above)										A. PRO- CESS CODE (from list above)									
B. PROCESS DESIGN CAPACITY										B. PROCESS DESIGN CAPACITY									
1. AMOUNT (specify)										1. AMOUNT									
2. UNIT OF MEAS- URE (enter code)										2. UNIT OF MEAS- URE (enter code)									
FOR OFFICIAL USE ONLY										FOR OFFICIAL USE ONLY									
16 - 18 19										16 - 18 19									
27										27									
28										28									
29 - 32										29 - 32									
X-1 S 0 2 600 G										5 S 0 4 3,000 G									
X-2 T 0 3 20 E										6									
1 T 0 1 250,000 U										7									
2 S 0 1 50 Y										8									
3 S 0 1 8,000 G										9									
4 S 0 2 200,000 G										10									
16 - 18 19										16 - 18 19									
27										27									
28										28									
29 - 32										29 - 32									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
S W 1 L D 0 0 5 2 1 1 5 4 5 T/A C 1													S W DUP T/A C 2 DUP												
1 2 13 14 15													1 2 13 14 15 23 26												
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																					
23	24	25	26	27	28	29	30	31	32	33	34	35	36	27	28	29	27	28	29	27	28	29	27	28	29
1	K 0 6 2	300,000	T											T 0 1	S 0 2	S 0 4									
2	D 0 0 0																								
3	D 0 0 2																								
4	F 0 1 0																								
5	F 0 1 1																								
6	K 0 6 3	1,250	T											S 0 2											
7	K 0 6 1	30	T											S 0 1											
8	F 0 1 2																								
9	F 0 0 1	60	T											S 0 1											
10																									
11																									
12																									
13																									
14																									
15																									
16																									
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19																									
20																									
21																									
22																									
23																									
24																									
25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	I	L	D	0	0	5	2	1	1	5	4	5	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	2	0	2	3	0	N
65	66	67	68	69	70	71

0	8	7	4	6	0	2	W
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

E. T. Vogel

B. SIGNATURE

E T Vogel

C. DATE SIGNED

11-17-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

E. T. Vogel

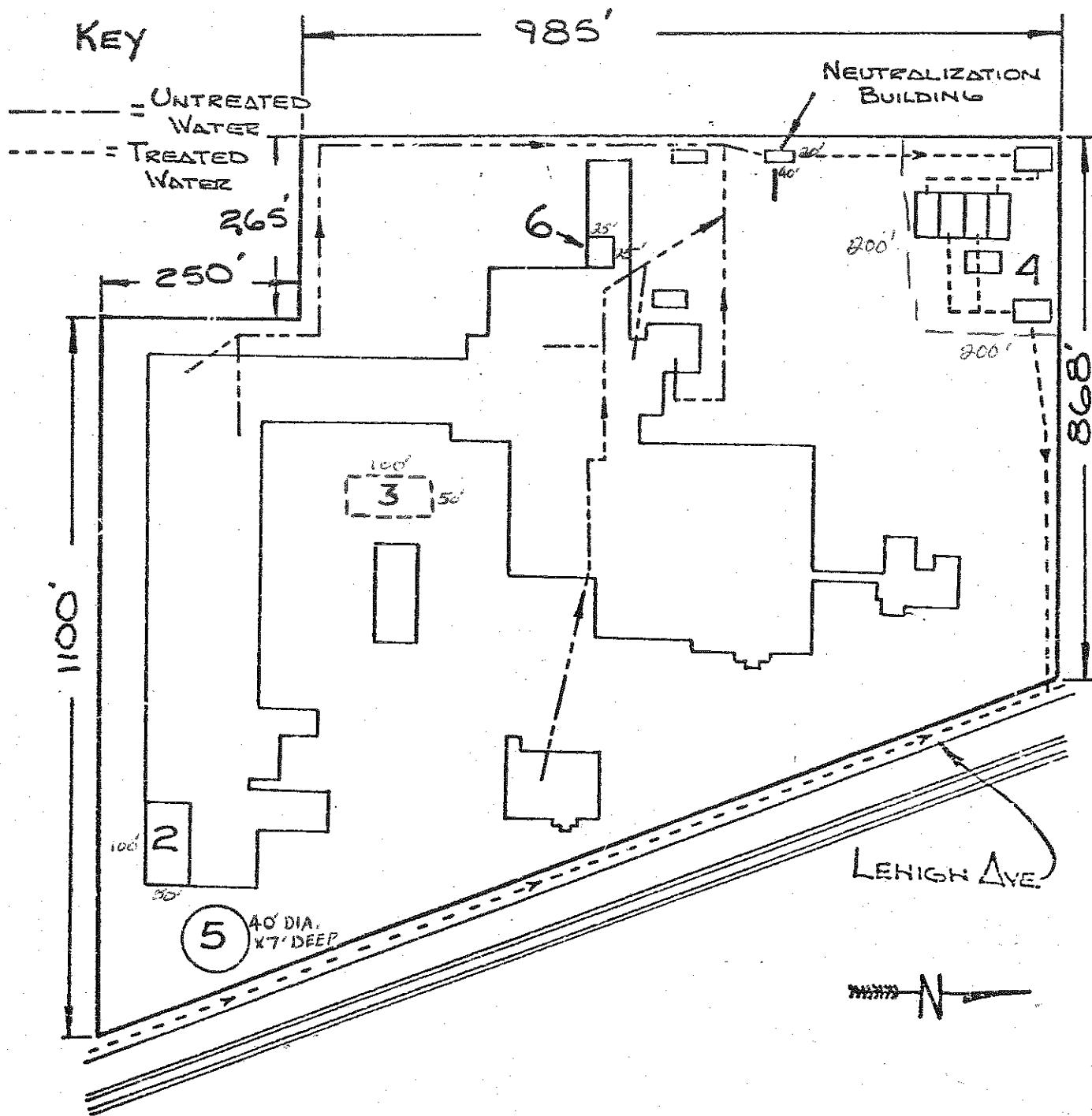
B. SIGNATURE

E T Vogel

C. DATE SIGNED

11-17-80

V. FACILITY DRAWING (see page 4)



1. Neutralization Treatment Building.
2. Bag Houses and Bag House Dust Storage.
3. Spent 1,1,1-Trichloroethane Drum Storage.
4. Lime Sludge Tank Storage and Controls.
5. Recirculating Quench Water in a Surface Impoundment.
6. Past Storage Area - Kolene Salt Sludge.

----- Industrial Wastewater Sewer System

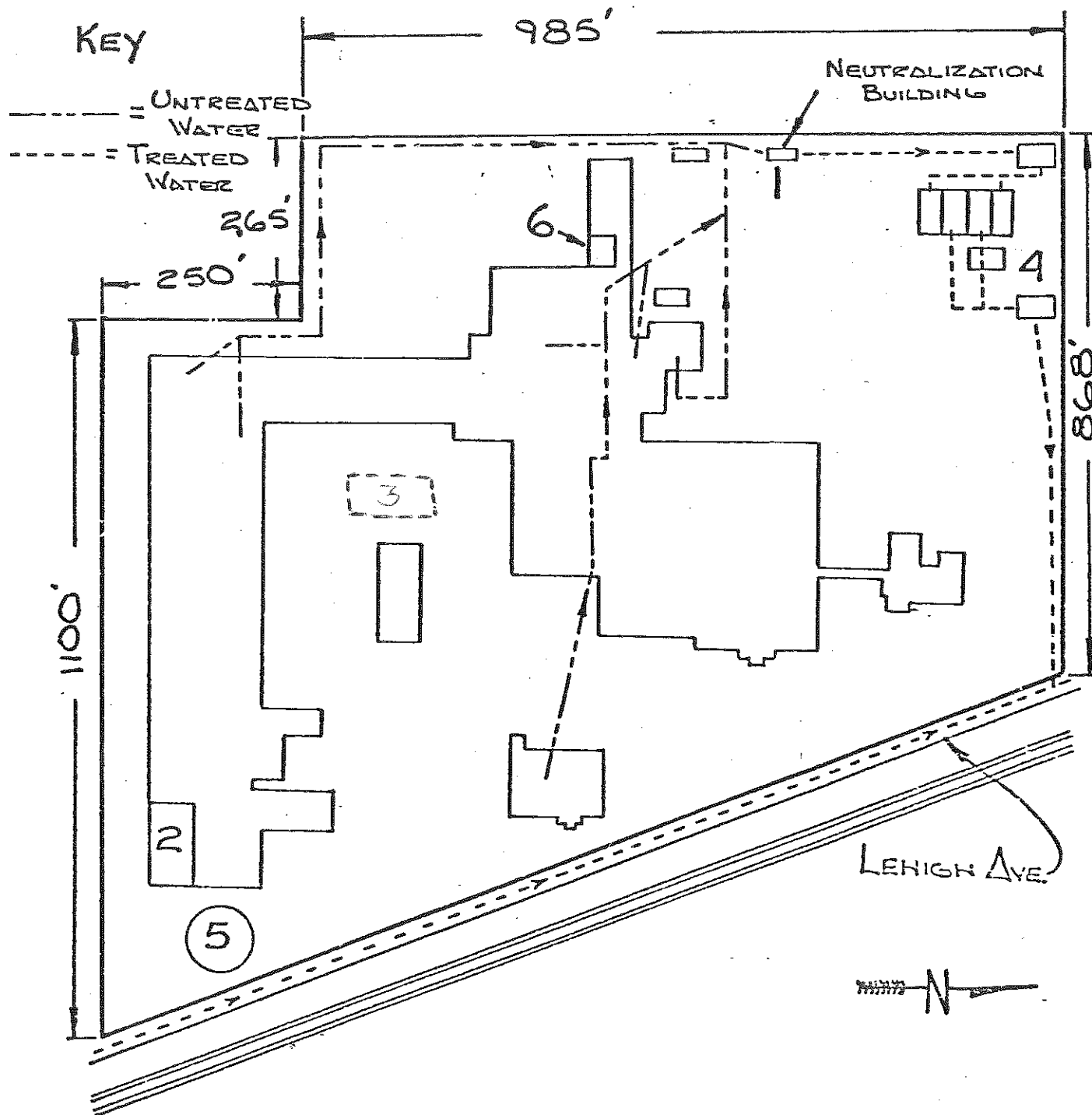
SCALE = $\frac{1}{2}$ " = 100'

10/31/80

DMO

V. FACILITY DRAWING (see page 4)

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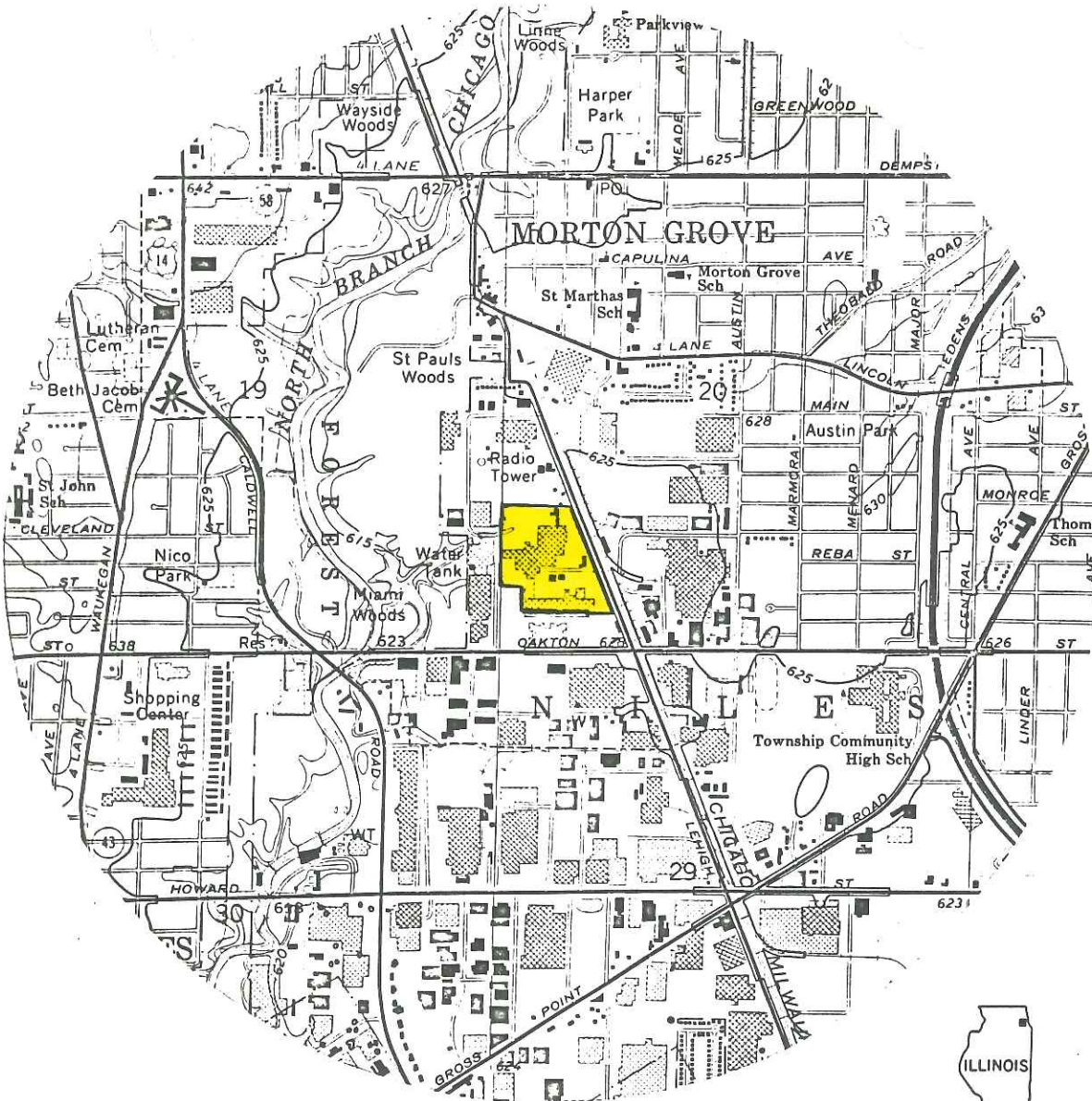
1. Neutralization Treatment Building.
2. Bag Houses and Bag House Dust Storage.
3. Spent 1,1,1-Trichloroethane Drum Storage.
4. Lime Sludge Tank Storage and Controls.
5. Recirculating Quench Water in a Surface Impoundment.
6. Past Storage Area - Kolene Salt Sludge.

----- Industrial Wastewater Sewer System

SCALE = $\frac{1}{2}" = 100'$

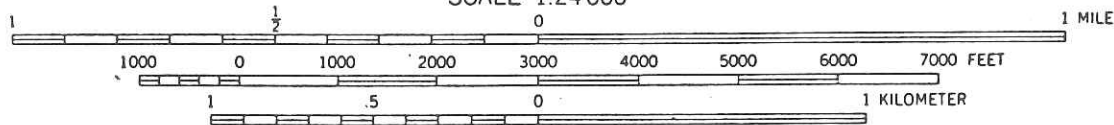
10/31/80

DMO



QUADRANGLE LOCATION

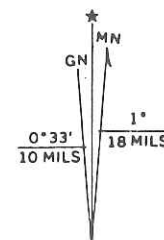
SCALE 1:24 000



CONTOUR INTERVAL 5 FEET
DATUM IS MEAN SEA LEVEL

Notes:

1. 001 indicates a storm water and non-contact cooling water outfall per NPDES Permit #IL0034851 which empties into the North Branch of the Chicago River.
2. The North Branch of the Chicago River flows to the South.
3. Location of ITT Harper to nearest second is $42^{\circ} 02' 30''$ N, $87^{\circ} 46' 02''$ W.
4. A copy of page 5 from Part 3 of this application is attached to better illustrate the exact locations of each hazardous waste Management Facility.



TAKEN FROM
PARK RIDGE, ILL.
N4200—W8745/7.5

1963
PHOTOREVISED 1972
AMS 3468 III SE—SERIES V863

UTM GRID AND 1972 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

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ATTACHMENT A

Illinois NPDES Permit #IL0034851

Effective Date: August 16, 1980
Expiration Date: May 1, 1985

During a phone conversation with Mr. Cho of the US EPA region V office in Chicago, Mr. Cho confirmed that since the above mentioned NPDES permit had just recently been renewed for a term of 5 years, it was not necessary to file Form 2C as part of this application. Instead, this note and a copy of the current NPDES Permit are attached.

10/1/80

NPDES Permit No. IL0034851

Illinois Environmental Protection Agency

Division of Water Pollution Control

2200 Churchill Road

Springfield, Illinois 62706

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date: May 1, 1985 Issue Date: July 16, 1980
Effective Date: Aug. 16, 1980

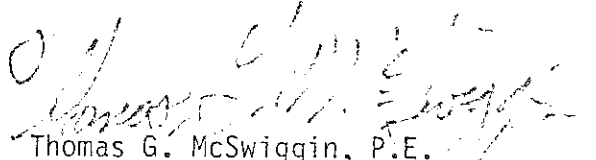
Permittee: ITT Harper, A Division of International
Telephone and Telegraph Corp.

Facility Name and Address: ITT Harper, A Division of International
Telephone & Telegraph Corp., 8200 LeHigh
Avenue, Morton Grove, Illinois 60053,
Cook County

Receiving Waters: The North Branch of the Chicago River

In compliance with the provisions of the Illinois Environmental Protection Act, the Chapter 3 Rules and Regulations of the Illinois Pollution Control Board, and the FWPCA, the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.


Thomas G. McSwiggin, P.E.
Manager, Permit Section
Division of Water Pollution Control

TGM:LWE:YVS:dkr:sp/3149b

NPDES Permit No. IL0034851

ATTACHMENT B

Effluent Limitations and Monitoring

Discharge Number(s): 001

Discharge Name(s): Noncontact Cooling Water and Stormwater

From effective date of permit until the expiration date of the Permit, the effluent of the above discharge(s) shall be monitored and limited at all times as follows:

PARAMETER	CONCENTRATION LIMITS mg/l			LOAD LIMITS lbs/day (Kg/day)			SAMPLE FREQUENCY IF DISCHARGE OCCURS	SAMPLE TYPE
	30 DAY	7 DAY	DAILY	30 DAY	7 DAY	DAILY		
	AVG.	AVG.	MAX.	AVG.	AVG.	MAX.		
Flow (MGD)							Measure When Monitorin	
pH	See Attachment B Continued						1/Month	Grab
Temperature	See Attachment B Continued						1/Month	Grab
Oil Fats & Grease	15		30				1/Month	Grab

ATTACHMENT B CONTINUED

1. The pH shall be in the range 6.0 to 9.0.
2. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.
3. For the purpose of this permit this discharge is limited solely to noncontact cooling water and stormwater free from any other waste water discharges.
4. The permittee shall record monitoring results on Discharge Monitoring Report Forms using one such form for each discharge each month.

Discharge Monitoring Reports shall be mailed to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Attention: NPDES Unit (DMR)

Compliance Assurance Unit
original & one copy -

5. The completed Discharge Monitoring Report forms shall be retained by the permittee for a period of six months and then shall be mailed and received by the IEPA in accordance with the following schedule, unless otherwise specified by the permitting authority.

Period	Received by IEPA
March, April, May, June, July, August	September 15
September, October, November, December, January, February	March 15

ATTACHMENT B

Additional Environmental Permits

Illinois Special Waste Disposal Permits

- #998686 - Hauling of Chlorinated Solvent for Reclaim
- #998263 - Hauling of Waste Oil for Reclaim
- #781452 - Hauling and Disposal of Stamping Parts Rinse
- #997603 - Same as #781452, but for Reclaim
- #781522 - Hauling and Disposal of Metal Hydroxide Sludge.
- #997259 - Hauling of Chlorinated Solvent for Reclaim

Air Permits

- Illinois EPA #02090095 - Entire Plant and Arc Furnaces
- Illinois EPA #72111515 - Preheat Furnace
- Illinois EPA #04100068 - Sauder Annealing Furnace
- Cook County #093215 - Entire Plant

10/1/80

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

FIELD 005211545

FOR OFFICIAL USE ONLY

APPLICATION DATE RECEIVED
APPROVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PRO-
CESS
CODEAPPROPRIATE UNITS OF
MEASURE FOR PROCESS
DESIGN CAPACITY

PROCESS

Storage:
CONTAINER (barrel, drum, etc.) S01 GALLONS OR LITERS
TANK S02 GALLONS OR LITERS
WASTE PILE S03 CUBIC YARDS OR
CUBIC METERS
SURFACE IMPOUNDMENT S04 GALLONS OR LITERS

Disposal:
INJECTION WELL D79 GALLONS OR LITERS
LANDFILL D80 ACRE-Feet (the volume that
would cover one acre to a
depth of one foot) OR
HECTARE-METER
LAND APPLICATION D81 ACRES OR HECTARES
OCEAN DISPOSAL D82 GALLONS PER DAY OR
LITERS PER DAY
SURFACE IMPOUNDMENT D83 GALLONS OR LITERS

Treatment:

TANK T01 GALLONS PER DAY OR
LITERS PER DAY
SURFACE IMPOUNDMENT T02 GALLONS PER DAY OR
LITERS PER DAY
INCINERATOR T03 TONS PER HOUR OR
METRIC TONS PER HOUR;
GALLONS PER HOUR OR
LITERS PER HOUR
T04 GALLONS PER DAY OR
LITERS PER DAY

OTHER (Use for physical, chemical,
thermal or biological treatment
processes not occurring in tanks,
surface impoundments or inciner-
ators. Describe the processes in
the space provided; Item III-C.)

UNIT OF
MEASURE
CODE

UNIT OF MEASURE

GALLONS G
LITERS L
CUBIC YARDS Y
CUBIC METERS C
GALLONS PER DAY U

UNIT OF
MEASURE
CODE

UNIT OF MEASURE

LITERS PER DAY V
TONS PER HOUR D
METRIC TONS PER HOUR W
GALLONS PER HOUR E
LITERS PER HOUR H

UNIT OF
MEASURE
CODE

UNIT OF MEASURE

ACRE-Feet A
HECTARE-METER F
ACRES B
HECTARES Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S		T/A		C					
C		DUP		1					
1 12		13 14 15		16 17 18					
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEAS- URE (enter code)				1. AMOUNT	2. UNIT OF MEAS- URE (enter code)	
16	17	18	19	20	21	22	23	24	25
X-1	S 0 2	600	G		5	S 0 4	3,000	G	
X-2	T 0 3	20	E		6				
1	T 0 1	250,000	U		7				
2	S 0 1	10,100 50 x 202 g/cupd	G		8				
3	S 0 1	18,100 8,000	G		9				
4	S 0 2	200,000	G		10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES (INCLUDE DESIGN CAPACITY).

OR DESCRIBING OTHER PROCESSES (code "T")

FOR EACH PROCESS ENTERED HERE

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics, and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS. P
TONS. T

METRIC UNIT OF MEASURE CODE
KILOGRAMS. K
METRIC TONS. M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 300 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W 1 L D C C C 2 1 1 5 9 5										DUP									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES												
							1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
1	K	0	6	2	300,000	T	T	0	1	S	0	2	S	0	4				
2	D	0	0	0												Included w/above			
3	D	0	0	2												Included w/above			
4	F	0	1	0												Included w/above			
5	F	0	1	1												Included w/above			
6	K	0	6	2	1,250	T	S	0	2										
7	K	0	6	1	30	T	S	0	1										
8	F	0	1	2												Included w/above			
9	F	0	0	1	60	T	S	0	1										
10																			
11																			
12																			
13																			
14																			
15																			
16																			
17																			
18																			
19																			
20																			
21																			
22																			
23																			
24																			
25																			
26																			

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE

EPA I.D. NO. (enter from page 1)															
S	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
F	I	L	D	0	0	5	2	1	1	5	4	5			6
T/A C															

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
4	2		0	2		3	0	N		0	8	7		4	6		0	2	W
61	62		63	64		65	66	67		74	75		76	77		78	79	80	

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)									
E															55 56 - 58 59 - 61 62 - 65									
3. STREET OR P.O. BOX															4. CITY OR TOWN									
F															G									
5. ST.															6. ZIP CODE									
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100																								

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

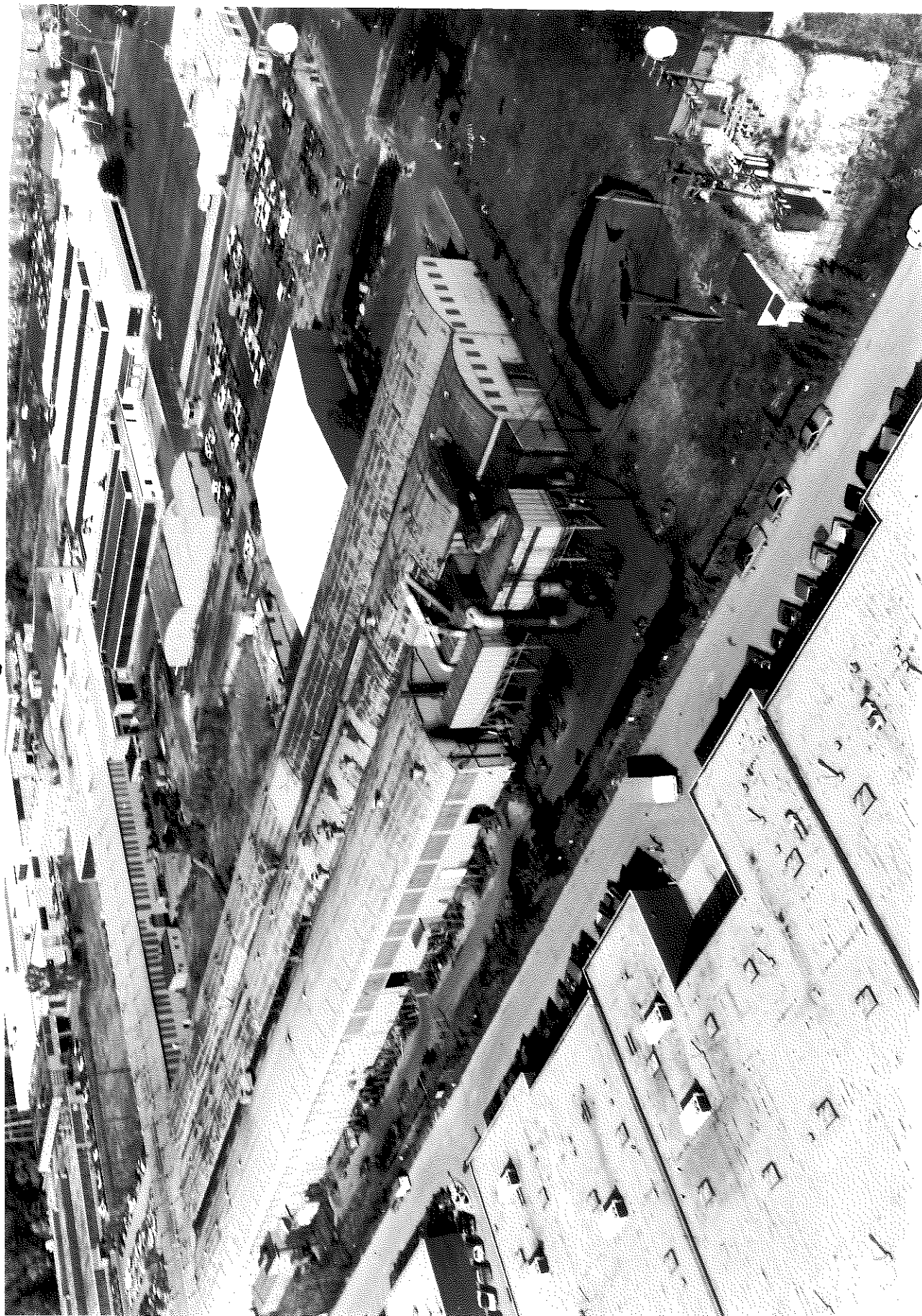
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
E. T. Vogel	ET Vogel	11-17-80

X. OPERATOR CERTIFICATION

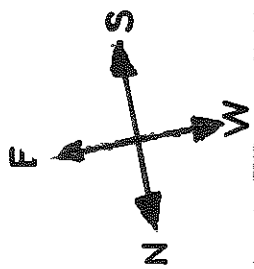
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
E. T. Vogel	ET Vogel	11-17-80

W N
S E



349



A.4 Closure/Post-Closure



217/782-6762

Refer to: 0311950005 -- Cook County
ITT Harper Corporation
ILD005211545
RCRA-Closure

Log #C-855

March 15, 1988

Mr. Milo ~~an~~ E.I.T.
ITT Corporation
8200 Lehigh Avenue
Morton Grove, Illinois 60053

Dear Mr. Milo:

The subject hazardous waste management facility was inspected by a representative of this Agency on February 16, 1988. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated November 18, 1982.

Certification that the ITT Harper Corporation plant had been closed in accordance with the approved closure plan by the owner/operator, yourself, and an independent registered professional engineer, Gary E. Vajda, P.E., of Illinois was received at this Agency December 3, 1987.

The Agency has determined that the closure of the ITT Harper Corporation plant has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, the Agency has withdrawn your Part A dated November 17, 1980 to reflect the status change due to completed closure activities.

If you have any questions, please contact Karen Nachtwey at 217/782-0892.

Very truly yours,

Lawrence W. Eastep By CAZ

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:KN:rd0751j/5

cc: Northern Region
USEPA Region V, Mary Murphy ✓
USEPA Region V, Art Kawatachi
Gary E. Vajda, P.E.
Division File
Andy Vollmer
Compliance Section



Illinois Environmental Protection Agency

217/782-6762

Refer To: 03119505 -- Cook County/Morton Grove/ITT Harper

February 23, 1983

IL0005 211545 G, TSD, PA

ITT Harper
8200 Lehigh Avenue
Morton Grove, Illinois 60053

Attn: Timothy S. Milo, Plant Engineer

Gentlemen:

A review has been made of the Closure Plan transmitted with a letter from Timothy S. Milo dated November 18, 1982 and received by the Agency November 24, 1982. The following comments are transmitted from your consideration pursuant to that review.

The closure plan submitted did not appear to contain the following:

1. An estimate of the schedule for final closure, including the total time required for closure activities as required by 35 Ill. Adm. Code 725.212(a)(4), see 40 CFR 265.112(a)(4).
2. The waste inventory as required by 35 Ill. Adm. Code 725.212(a)(2), see 40 CFR 265.112(a)(2).
3. How final closure activities will be conducted according to regulations 35 Ill. Adm. Code 725.212(a)(1), see 40 CFR 265.112(a)(1).
4. A description of how closure minimizes the need for post-closure maintenance and minimizes the release of waste, 35 Ill. Adm. Code 725.211(a), 40 CFR 265.111(a).
5. A copy of the financial assurance mechanism 35 Ill. Adm. Code 725.243, see 40 CFR 265.143.
6. Post-closure care and use of property including groundwater monitoring 35 Ill. Adm. Code 725.217(a)(1), see 40 CFR 264.117(a)(1).

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FEB 01 1983
March
**WASTE MANAGEMENT
BRANCH**

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3/02/83



Illinois Environmental Protection Agency

Page 2

For the foregoing reasons your closure plan is disapproved. If you have any questions concerning these comments, please contact Robert C. Mulvey telephone 217/782-3335.

Very truly yours,

Thomas E. Cavanagh Jr.

Thomas E. Cavanagh, Jr., Manager
Permit Section
Division of Land Pollution Control

TEC:RCM:sc/6494c/4-5

cc: USEPA Attn: William H. Miner
Northern Region
Compliance Monitoring
Robert C. Mulvey

WASTE MANAGEMENT
SECTION

JAN 26 1982

Mr. Timothy Milo
Plant Engineer
ITT-Harper
8200 Lehigh Avenue
Morton Grove, Illinois 60601

ILD 005 211 545

Dear Mr. Milo:

Notice is hereby given that the hazardous waste surface impoundment previously operated by ITT-Harper, 8200 Lehigh Avenue, Morton Grove, Illinois 60053 is considered closed in accordance with 40 CFR 265. This is based on our approval of the closure plan as submitted May 18, 1981, and modified June 30, 1981, and the certifications of closure by Dames & Moore and ITT-Harper.

We have determined that the hazardous waste impoundment has been completely excavated and removed in accordance with the closure plan, and that analysis of soil taken from below the excavated area indicates the absence of contaminants. Accordingly, it will not be necessary for this facility to meet the groundwater monitoring requirements which became effective November 19, 1981.

Please do not hesitate to contact Mr. Thomas B. Golz of my staff, at (312) 886-4023, if you should have any questions regarding this determination.

Sincerely,

Basil G. Constantelos
Acting Director
Waste Management Division

bcc: RAIS, Permit File
Robert L. Stone, SIO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: JAN 19 1982
SUBJECT: Closure Plan Approval, ITT-Harper
FROM: Karl J. Klepitsch Jr., Chief
Waste Management Branch
TO: B. G. Constantelos, Acting Director
Waste Management Division

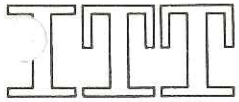
14D005 211 545

ITT-Harper, Morton Grove, Illinois submitted a closure plan on May 18, 1981, and subsequent modifications on June 30, 1981. A public notice on its availability for inspection was published October 8, 1981. The public comment period closed with no adverse comment 30 days later.

The closure plan describes the excavation and removal of a hazardous waste surface impoundment.

On November 13, 1981, the firm independently contacted David Kee and Thomas Golz, requesting a waiver of the groundwater monitoring requirement which went into effect November 19, 1981. In that the impoundment is out-of-service and removed, I recommend foregoing the groundwater monitoring requirement. The public cannot conceivably benefit from the installation and operation of wells in the area where the impoundment previously existed. Furthermore, analysis of samples of soil taken from below the excavated area indicates the absence of contaminants.

TOM GOLZ:A.SUTTON:5AHMM:6-7482:1/18/82



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NOV 17 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

ITT Harper 

A Division of
International Telephone and Telegraph Corporation

8200 Lehigh Avenue

Morton Grove, Illinois 60053

(312) 966-6000 Telex 724-464

November 13, 1981

Mr. Tom Golz
United States Environmental
Protection Agency
Hazardous Waste Management Div.
111 Jackson Boulevard
Chicago, Illinois

Dear Tom:

Per my recent phone conversations with Mr. David Kee, Director Air and Hazardous Materials Division, and yourself, during which we discussed the closure of ITT Harper's surface impoundment, this letter will serve to confirm the following:

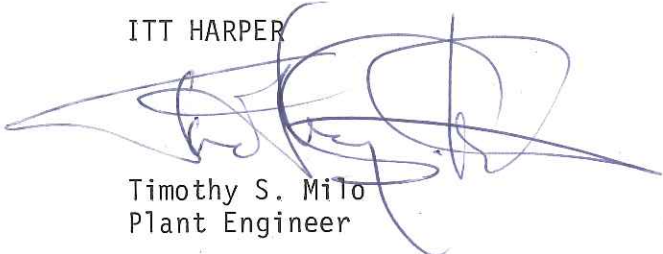
1. Because of the upcoming requirements concerning ground water monitoring facilities for surface impoundments, Harper elected to close its impoundment prior to November 19, 1981.
2. The impoundment was to be replaced by a conventional type cooling tower system.
3. Due to various administrative and installation problems, Harper will be unable to complete the closure of the impoundment prior to November 19, 1981.
4. A request was made, by myself, on behalf of ITT Harper, to Mr. Kee, that USEPA waive the ground water monitoring requirements by extending the previously mentioned November 19, 1981 deadline to December 31, 1981.
5. On November 13, 1981 you informed me that Mr. Kee and yourself had agreed that an extension and waiver as stated above was in the best interests of all concerned parties.
6. As you are now drafting up a letter to ITT Harper indicating approval of the closure plan, you stated that authorization for the December 31, 1981 deadline would be included at the same time. This letter would be signed by Valdus Adamkus, Acting Regional Administrator - Region V - USEPA.

Mr. Tom Golz
November 13, 1981
Page Two

I wish to express my appreciation of the prompt consideration given to this matter. As always, we will continue to keep you informed of any pertinent events.

Best regards,

ITT HARPER



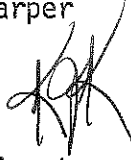
Timothy S. Milo
Plant Engineer

TM/ks

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: January 14, 1982

SUBJECT: Closure Plan Approval, ITT-Harper

FROM: Karl J. Klepitsch Jr., Chief
Waste Management Branch 

TO: B. G. Constantelos, Acting Director
Waste Management Division

ITT-Harper, Morton Grove, Illinois submitted a closure plan on May 18, 1981, and subsequent modifications on June 30, 1981. A public notice on its availability for inspection was published October 8, 1981. The public comment period closed with no adverse comment 30 days later.

The closure plan describes the excavation and removal of a hazardous waste surface impoundment.

On November 13, 1981, the firm independently contacted David Kee and Thomas Golz, requesting a waiver of the groundwater monitoring requirement which went into effect November 19, 1981. In that the impoundment is out-of-service and removed, I recommend foregoing the groundwater monitoring requirement. The public cannot conceivably benefit from the installation and operation of wells in the area where the impoundment previously existed. Furthermore, analysis of samples of soil taken from below the excavated area indicates the absence of contaminants.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DRAFT

09 SEP 1981

DATE:

SUBJECT: Closure Plan - ITT Harper, Morton Grove

FROM: Hak Cho, Chief
State Technical Unit #1

THRU: Eugene Meyer, Chief
Technical Programs Section

TO: Judy Kertcher, Chief
Regulatory Analysis and Information Section

STU#1 has reviewed the closure plan for the above facility, EPA ID# ILD 005 211 545, and found it acceptable. The plan proposes to remove a surface impoundment containing spent pickle liquor from steel finishing, EPA hazardous waste No. K 062, in its entirety. The plan calls for neutralization and off-site disposal of 5,000 gallons of sludge and 200 cubic yards of liner material and contaminated soils.

Because the closure financial assurance requirements are not yet in effect, this planned closure has no RCRA financial responsibility implications.

Attached is a proposed public notice advising the public on the availability of the plan. In that the facility is in the Chicago commuting area, and that the closure should be non-controversial, a single public inspection site ought to be sufficient.

~~1st~~ Second inspection site-public library or the facility office can be arranged quickly, this would be more desirable.

DATE: 8 AUG 1981

SUBJECT: Attached Proposed Notice-Closure Plan
ITT Harper, Morton Grove

ILD005211545

FROM: Hak Cho, Chief
State Technical Unit #1

THRU: Eugene Meyer, Chief
Technical Programs Section

TO: Judy Kerttner, Chief
Regulatory Analysis Section

The attached public notice advises the public of availability of the closure plan for the above facility, EPA ID# ILD005211545.

The plan proposes to remove a surface impoundment containing spent pickle liquor from steel finishing, EPA hazardous waste No. K062, in its entirety. The plan calls for neutralization and offsite disposal of 5000 gallons of sludge and 200 cubic yards of lines and contaminated soils.

Attachment

5A&HWM:TOM GOLZ:A.SUTTON:8/18/81:6-7482

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: SEP 10 1981

SUBJECT: Closure Plan - ITT Harper, Morton Grove

FROM: Hak Cho, Chief
State Technical Unit #1

THRU: Eugene Meyer, Chief
Technical Programs Section

TO: Judy Kertcher, Chief
Regulatory Analysis and Information Section

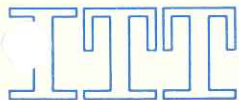
STU#1 has reviewed the closure plan for the above facility, EPA ID# ILD 005 211 545, and found it acceptable. The plan proposes to remove a surface impoundment containing spent pickle liquor from steel finishing, EPA hazardous waste No. K 062, in its entirety. The plan calls for neutralization and off-site disposal of 5,000 gallons of sludge and 200 cubic yards of liner material and contaminated soils.

Because the closure financial assurance requirements are not yet in effect, this planned closure has no RCRA financial responsibility implications.

Attached is a proposed public notice advising the public on the availability of the plan. In that the facility is in the Chicago commuting area, and that the closure should be non-controversial, a single public inspection site ought to be sufficient.

Second inspection site, public library or the facility office can be arranged quickly, if this would be more desirable.

5AHMD:WMB:H.CHO:C.MITCHELL:9/9/81



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MAY 21 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

May 18, 1981

ITT Harper 

A Division of
International Telephone and Telegraph Corporation

8200 Lehigh Avenue
Morton Grove, Illinois 60053
(312) 966-6000 Telex 724-464

Copy to T. Golz, D. Kee
orig to Judy K
HMB

Mr. David Kee
USEPA - Director Waste Mgmt. Div.
Region V - Waste Management Branch
111 W. Jackson Blvd.
Chicago, Ill. 60604

ILD 005211545

Dear Mr. Kee;

Per a previous telephone conversation with Tom Golz of your department, I am enclosing Harpers revised permit application which reflects our intention to close the surface impoundment identified as item 5 on the facilities description map. Also, enclosed, per EPA requirements, is a copy of Harpers' closure plan, and closure cost estimate for this project.

As discussed with Tom, Harper is now taking bids on a project to replace the impoundment with a conventional cooling tower system. Since this impoundment served only as a water storage pond for the existing cooling process, this is an easily accomplished change.

Preliminary projections call for the new cooling system to be installed and ready to operate by September of 1981. The surface impoundment would then become non-operational, awaiting closure. It is Harpers' intent to implement the enclosed closure plans, making the impoundment a closed facility, by November 19, 1981.

Tom confirmed that the enclosed documents fulfilled EPA notification requirements, and that no additional information is necessary at this time.

I expect to meet with Tom early next week to go over the enclosed material. If you have any questions or comments, and if you could make yourself available, it would be a pleasure to have you present at our meeting.

Your prompt consideration of this matter is greatly appreciated.

Sincerely,

ITT HARPER


Timothy Milo
Plant Engineer

SUB. PART A

TM/tg

cc: Valdus Adamkus
USEPA Regional Administrator
Tom Golz
USEPA Waste Mgmt. Branch

MAY 19 1981

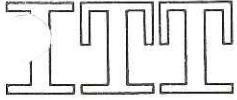
MAY 28 1981



CSC - COUNTED AS OF 5-19

MAY 22 1981

MAY 28 1981



ITT Harper 

*A Division of
International Telephone and Telegraph Corporation*

*8200 Lehigh Avenue
Morton Grove, Illinois 60053
(312) 966-6000 Telex 724-464*

December 23, 1981

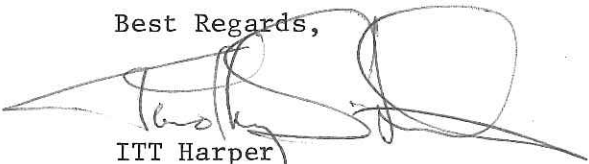
ILD005211545
g.TSD, PA gmb

Regional Administrator
USEPA Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Sir:

In accordance with RCRA regulations, ITT Harper is submitting this letter of certification pertaining to the closure of the surface impoundment which was located in the south-east corner of our property. With reference to the attached Certification from Dames and Moore, the Consulting firm retained by Harper to bear witness to the activities of closure, Harper believes the closure was performed in good faith and in accordance with the submitted closure plan.

Best Regards,

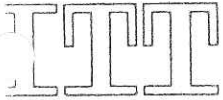

ITT Harper
Timothy S. Milo
Plant Engineer

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DEC 31 1981

WASTE MANAGEMENT BRANCH
EPA REGION V

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12/31/81



ITT Harper 

*A Division of
International Telephone and Telegraph Corporation*

*8200 Lehigh Avenue
Morton Grove, Illinois 60053
(312) 966-6000 Telex 724-464*

December 23, 1981

Tom Golz
USEPA Region V
230 South Dearborn
Chicago, Illinois 60604


Dear Tom,

Attached is an inspection report and Certification from Dames and Moore, the Engineering Consulting Firm, retained by ITT Harper, for the purpose of witnessing the closure of Harpers surface impoundment. Please note that due to inclement weather conditions, final site restoration (ie. sodding or seeding) will occur early next spring. This will give the fill a chance to settle prior to final grading.

Also attached is a letter from ITT Harper to the USEPA Regional Administrator certifying the proper closure of the surface impoundment.

I would like to take this opportunity to thank you for all of your help and co-operation in this matter. If there are any questions, or if I may be of any service in the future, please do not hesitate to call me directly.

Best Regards,


ITT Harper
Timothy S. Milo
Plant Engineer

cc: Regional Administrator

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EPA REGION V

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12/31/81

Dames & Moore



1550 Northwest Highway
Park Ridge, Illinois 60068
(312) 297-6120
TWX: 910-253-4097 Cable address: DAMEMORE

December 22, 1981

ITT Harper
8200 Lehigh Avenue
Morton Grove, Illinois 60053

Attention: Mr. Timothy S. Milo
Plant Engineer

Gentlemen:

Re: Closure Inspection and Certification
Surface Impoundment

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DEC 23 1981

INTRODUCTION

This letter report formalizes the results of our on-site inspections of portions of the operations associated with closure of the surface impoundment at ITT Harper's Morton Grove plant. The original scope of our services was outlined in our proposal dated October 6, 1981, and authorized under ITT Harper Purchase Order No. (P) 199508 dated November 6, 1981.

The impoundment was part of a recirculating cooling system associated with the rolling mill. The impoundment was located in the southeast corner of the ITT Harper property at 8200 Lehigh Avenue in Morton Grove, IL. We understand that agreement with the U.S. EPA on closure of the impoundment is documented in the attached "CLOSURE PLANS FOR SURFACE IMPOUNDMENT" and subsequent modification described in the June 30, 1981 letter to Mr. Tom Golz of the U.S. EPA, presented as Attachment 1A and 1B. These documents have formed the basis of our inspections and this certification.

SCOPE OF WORK

The purpose of our services was to observe and provide documentation of major tasks involved in the closure of the impoundment. Specifically, our services were to include:

1. One site visit during initial removal of the liquid phase in the pond;
2. One site visit observing the sampling of sludge in the pond;
3. One site visit observing the removal of sludge and contaminated soils from the pond;

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12/31/81



ITT Harper
December 22, 1981
Page - 2 -

4. One site visit observing final sampling of the in-situ soil to be left in the pond;
5. One site visit observing the final site grading operations; and
6. Review of pertinent records and test results, and documentation of the results in a written report.

As a result of chemical analyses performed by an independent laboratory that determined the materials in the bottom of the impoundment to be classified as non-hazardous under RCRA, the scope of work performed was somewhat reduced. Items 3 and 4 above were deleted because the closure tasks to be observed were not performed since ITT Harper's interpretation of the closure plan required removal of only the materials classified as hazardous.

SUMMARY OF INSPECTIONS

Site visits were conducted on November 19, and November 20, 1981, to observe the pumping systems and operation. Piping systems were examined and pumping observed in progress. An inspection of sampling operations was made on December 3, 1981. Tube samples were taken at six locations shown on Attachment 2, relative to the impoundment perimeter. The samples were collected by pushing tubes to the underlying soil around the periphery of the water, which had been pumped down to form a surface approximately one-half the normal impoundment diameter. Samples were obtained, labeled, and handed over to representatives of Tenco Laboratories Division of THX, who served as ITT Harper's chemistry laboratory subcontractor.

A final site visit was made on December 18, 1981, to observe the commencement of backfilling operations. The liquid in the impoundment had reportedly been pumped to within 1 to 2 feet of the bottom on two occasions; however, the level recovered somewhat upon cessation of pumping. Pumping of the liquid in the impoundment continued during the backfilling operations. Fill material consisted primarily of topsoil stockpiled adjacent to the impoundment. The final grading included mounding over the impoundment to preclude ponding of water subsequent to self-weight settlement of the fill.

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DEC 31 1981

WASTE MANAGEMENT BRANCH
EPA REGION V

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12/31/81



ITT Harper
December 22, 1981
Page - 3 -

CONCLUSION

In our opinion, the closure of the impoundment was performed in good faith and in accordance with the interpretation of the referenced closure plan.

Respectfully submitted,

DAMES & MOORE

Jerry W H Wang

Jerry W. H. Wang, P.E.
Associate
Illinois Registration No. 62-34375

William J. Babcock

William J. Babcock, P.E.
Project Engineer
Illinois Registration No. 062-039556

JWHW:WJB:jeh

Attachments - Attachment 1A - "CLOSURE PLANS FOR SURFACE
IMPOUNDMENT"

Attachment 1B - Letter to Tom Golz

Attachment 2 - Sample Location

Three Copies Submitted

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WASTE MANAGEMENT BRANCH
EPA REGION V

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ENVIRONMENTAL CONTROL MANUAL

ITT Harper



A Division of
International Telephone
and Telegraph Corporation

CLOSURE PLANS FOR SURFACE IMPOUNDMENT


- I. Upon making the decision to close the rolling mill cooling pond surface impoundment, the following actions will be taken.
 - A. Closure cost estimate will be reviewed.
 - B. A copy of the closure cost estimate and closure plans, and a revised RCRA permit application reflecting the closure will be forwarded to EPA at least 180 days prior to the intended closure date. A letter of intent stating the closure date shall accompany the above.
 - C. ITT Midwest Legal shall be contacted to review and comment on the above documents prior to EPA submittal.
- II. Upon receipt of written approval from E.P.A., the surface impoundment will be closed; adhering to the following plan.
 - A. All standing liquid in the impoundment will be removed by pumping into Harpers industrial treatment system. The Q.C. Dept. will be notified so additional analyses of treated effluent can be made.
 - B. All underlying soil including the clay liner, will be removed to a depth where no contamination exists. Removed material will be disposed of in a secured landfill.
 - C. As all contaminated material will be removed from the surface impoundment, and all underlying soil will be excavated & disposed of, a leachate collection system, or ground water monitoring system is not necessary.
 - D. Excavated area will be backfilled and graded to prevent run-on or pooling.
 - E. As all hazardous constituents will be removed (per item C above), capping the area with an impervious membrane will not be required.
 - F. Site restoration will include topsoil layer, and sodding or seeding as required.
 - G. This area is located within Harpers perimeter fencing, therefore, additional security fencing is necessary.
 - H. As all contaminated material will be removed from the surface impoundment, and all underlying soil will be excavated and disposed of, and further since the impoundment is located totally within Harpers property lines, no financial liability is anticipated, and no post closure care is needed.

RECEIVED
12/31/81

Revision	Effective Date	Authorization	Page

ITT

Copy

ITT Harper 

A Division of
International Telephone and Telegraph Corporation

8200 Lehigh Avenue
Morton Grove, Illinois 60053
(312) 966-6000 Telex 724-464

June 30, 1981

Mr. Tom Golz
United States Environmental Protection Agency
Hazardous Waste Management Division
111 Jackson Blvd.
Chicago, Ill.

Dear Tom;

Per our discussion of June 24th, this letter will confirm your review of Harper's closure plans for the surface impoundment, currently used as a storage facility for a recirculating cooling system. As we discussed, Harper's intent is to close the surface impoundment per the submitted closure plan, as a regulated facility. The following additions/modifications to the closure plan and the accompanying Part A permit are in order.

1. The depth of soil contamination will be determined by laboratory analysis, and certified by an independent laboratory. Depth of excavation may vary, dependent on analysis results.
2. Harper's Part A RCRA permit should be modified per the attached sheet. This is due to two reasons:
 - a. D000 was used to identify waste streams containing chromium and cadmium in hazardous concentrations. Because of a mis-interpretation of the appropriate numbering system to be used, D000 was shown. It is necessary to show these contaminants as D006 and D007.
 - b. F010, F011 and F012 have been eliminated due to revised specifications for hazardous wastes from specific sources. Please note that there has been a small change in the total annual waste volume which also reflects this elimination.

You confirmed that the above changes could be made without going through the De-Listing process. I have attached a modified Page 3 of the Part A permit application form for your records. Note that this is signed by myself, and ITT Harper's President, General Manager.

Mr. Tom Golz

June 30, 1981

Attachment 1B
Page 2

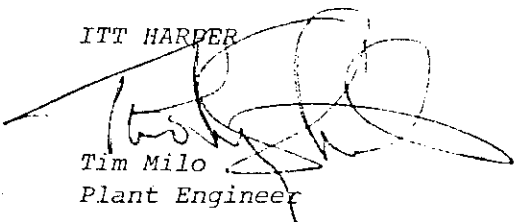
Thank you for the advance word of the various financial requirements soon to be implemented. Our Corporate Legal Staff and Unit Comptroller are now aware of the situation and are discussing our various options.

If there are any further questions or if I can be of any further service, please do not hesitate to contact me directly.

I'm sure we'll be talking again soon.

Sincerely,

ITT HARDER

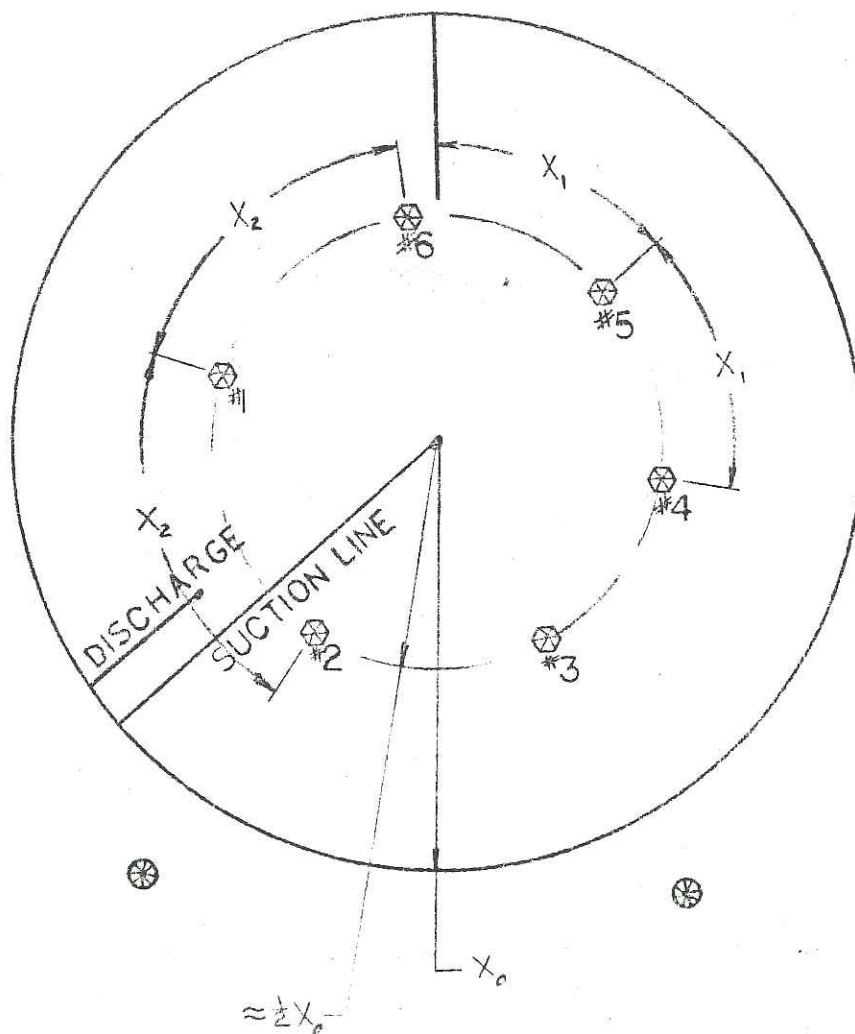


Tim Milo
Plant Engineer

TSM/tg

enclosure

ATTACHMENT 2



⊗ TELEPHONE POLE
⊗ SAMPLE LOCATION

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12/31/81

Tom for screening



ITT Harper

*A Division of
International Telephone and Telegraph Corporation*

**8200 Lehigh Avenue
Morton Grove, Illinois 60053
(312) 966-6000 Telex 724-464**

November 23, 1982

Mr. Valdas Adamkus
Regional Administrator
USEPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Adamkus:

Per a recent phone conversation with Mr. Thomas Golz of your staff, I am enclosing per EPA requirements, copies of ITT Harper's closure plans and closure cost estimates for all of Harper's hazardous waste facilities. As discussed with Tom, it is Harper's intent to completely cease all manufacturing operations at its Morton Grove facility. Tom confirmed that the enclosed documents fulfilled EPA notification requirements, and that no additional information was necessary at this time.

It should be noted that Harper has only recently made the decision to shutdown operations. Further, it is Harper's desire to complete the shutdown, and all associated hazardous waste facility closures in as orderly and expedient a fashion as possible, with the final goal of satisfying EPA requirements and having Harper's interim status withdrawn.

If there are any questions regarding the enclosed material, please feel free to contact me directly.

Your prompt consideration of this matter is greatly appreciated.

Sincerely,

Timothy S. Milo
Plant Engineer

/ks
Encl.
cc: Mr. William Miner

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WASTE MANAGEMENT BRANCH
EPA, REGION V



ENVIRONMENTAL CONTROL MANUAL

ITT Harper



A Division of
International Telephone
and Telegraph Corporation

SECTION III - 0

HAZARDOUS WASTE CONTROLS

I. Closure Plans for Tanks

Upon receipt of written approval from EPA, the tank will be closed, adhering to the following plan.

- A. All standing liquid will be removed by pumping into Harper's industrial treatment system. The Q.C. Department will be notified so additional analyses of treated effluent can be made.
- B. If, in the opinion of the Q.C. Department, Harper's industrial treatment system cannot effectively treat the waste liquid, it will be neutralized in the tank and services arranged for the proper hauling and disposal of liquid sludge.
- C. In the event that it is one of the tanks essential to the Harper industrial treatment system, which is being closed, step B will apply.
- D. The tank will be disposed of by:
 1. Decontamination and disposal at an off-site disposal facility.

-OR-

 1. Decontaminated on site for:
 - a. salvage
 - b. converted to other uses
- E. All hazardous waste generated as a result of a tank closure will be properly hauled and disposed of, observing all requirements of the Illinois & USEPA manifest system.

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ENVIRONMENTAL CONTROL MANUAL

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SECTION III - 0

HAZARDOUS WASTE CONTROLS

II. Closure Plans for Harper's Industrial Waste Water Sewer System

- A. All liquid will be removed and neutralized. Sludge and neutralized liquid will be hauled and disposed of properly.
- B. All sewer lines, manholes, valves, etc. will be flushed with water in a manner which will render the rinse-water non-hazardous.
- C. This rinse water will be subject to the process as in step A above.
- D. All hazardous wastes generated or accumulated as a result of this closure, will be properly hauled and disposed of, observing all requirements of the Illinois & USEPA manifest system.

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SECTION III - 0

HAZARDOUS WASTE CONTROLS

III. Closure Plans for the Casting Area Baghouse

- A. All baghouse bags will be removed and will be disposed of as hazardous waste.
- B. All waste will be removed from the interior of the baghouse and disposed of as hazardous waste.
- C. If necessary, the walls, floors, ceiling of the interior of the baghouses will be scraped or sand blasted, as required, to remove any hazardous waste residues.
- D. All waste removed from the baghouses will be properly hauled and disposed of, observing all requirements of the Illinois and USEPA manifest system.

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SECTION III - 0

HAZARDOUS WASTE CONTROLS

IV. Closure Plan for 1,1,1 - Trichlorethane Storage Area

- A. All degreasers will be emptied of waste material. This material will be placed in properly marked drums.
- B. All drums containing this waste material will be properly hauled and disposed of, observing all requirements of the Illinois and USEPA manifest system.
- C. Any contaminated, but empty drums, will be hauled and disposed of as hazardous waste.

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ENVIRONMENTAL CONTROL MANUAL

SECTION III - P

HAZARDOUS WASTE CONTROLS

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I. Closure Cost Estimate for Holding Tanks.

A. Disposal of standing liquid & sludge

1. Labor (Maint. & Q.C.) = 60 hrs @ 16.50/hr.	1000.00
2. Sludge & liquid disposal = 160,000 gallons X \$.20/gallon	32000.00

B. Decontamination costs

1. Maintenance & Q.C. labor = 10 hours X \$16.50 /hour	200.00
2. Sludge and liquid disposal costs = 20,000 gallons X \$.20/gallon	4000.00

C. Contingencies	2800.00
------------------	---------

\$40000.00

II. Closure cost estimate for Lime Neutralization Bldg.

A. Disposal of standing liquid & sludge

1. Labor (Maint. & Q.C.) = 30 hrs @ 16.50/hr.	500.00
2. Sludge & liquid control = 30,000 gallon X \$.20/gallon	6000.00

B. Decontamination costs

1. Maintenance & Q.C. labor = 10 hrs. X \$16.50/hr.	200.00
2. Sludge and liquid disposal costs = 5,000 gallons X \$.20/gallon	1000.00

C. Contingencies	1800.00
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\$9500.00

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ENVIRONMENTAL CONTROL MANUAL

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SECTION III - P

HAZARDOUS WASTE CONTROLS

III. Closure Costs Estimate for Industrial Sewer System

A. Disposal of liquid & decantamination

- | | |
|--|---------|
| 1. Contractor services for triple rinse with jetting equipment = \$750.00/day X 3 days | 2200.00 |
| 2. Neutralizing agents | 500.00 |
| 3. Sludge & liquid disposal 10,000 gallons X \$.20/gallon | 2000.00 |

- | | |
|------------------|---------------|
| B. Contingencies | 1300.00 |
| | <hr/> 6000.00 |

IV. Closure Cost Estimated for Baghouse

A. Disposal of excess waste

- | | |
|---|---------|
| 1. Maintenance labor to remove = 60 hours X \$16.50/hour | 1000.00 |
| 2. Transportation & disposal costs = approx. 100 yards ³ ÷ 10 yds. ³ /load X .385.00/load | 3500.00 |

B. Sand Blast/Cleaning of contaminate portions

- | | |
|--|---------|
| 1. Maintenance & labor 120 hrs. x \$16.50/hr | 2000.00 |
| 2. Transportation & disposal cost
Best guess estimate | 5000.00 |

- | | |
|------------------|----------------|
| C. Contingencies | 1500.00 |
| | <hr/> 13000.00 |

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**ENVIRONMENTAL
CONTROL MANUAL**

ITT Harper



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SECTION III - P
HAZARDOUS WASTE CONTROLS

V. Closure Cost Estimated for 1,1,1,-Trichloroethane

A. Disposal of maximum number of drums

1. Harper is currently sending this waste to be recycled. Minimum credit for this waste would occur if no waste was available.

(0.00)

B. Disposal of contaminated but empty drums

1. Transportation and disposal - maximum of 100 drums X \$30.00 /drum
2. Maintenance and labor = 5 hours X \$16.50/hr.

3000.00
85.00

C. Contingencies

415.00

3500.00

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DATE 7/30/85

CANCELLATION NOTICE

CERTIFICATE HOLDER:

Mr. Valdas V. Adamkus
Regional Administrator, USEPA
230 S. Dearborn Street
Chicago, Illinois 60604

RECEIVED

AUG 14 1985

SWB-AIS
U.S. EPA, REGION V

Insured(s): ITT Happer Division
EPA No.# ILD00521154⁵

Policy Number(s): SCG-GO-134004-9

Cancelled
Effective: November 7, 1983

RECEIVED

AUG 14 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

In accordance with the provisions of the Certificate of Insurance issued to you, notification of cancellation is hereby given for the above policy or policies.

Very truly yours,

Edward McFadden
Account Representative



DATE 7/30/85

CANCELLATION NOTICE

CERTIFICATE HOLDER:

Mr. Valdas V. Adamkus
Regional Administrator, USEPA
230 S. Dearborn Street
Chicago, Illinois 60604

Insured(s): ITT Happer Division
EPA No.# ILD005211545

Policy Number(s): SCG-GO-134004-9

Cancelled
Effective: November 7, 1983

RECEIVED

SEP 12 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

In accordance with the provisions of the Certificate of Insurance issued to you, notification of cancellation is hereby given for the above policy or policies.

Very truly yours,

Edward McFadden
Account Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. EPA ID #: ILD005211545

ITT CORP HARPER
8200 LEHIGH AVE
MORTON GROVE

IL 60053

RE: Hazardous Waste Permit Application

Dear Permit Applicant:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status" (or the State program equivalent), while complying with applicable technical and record-keeping standards.

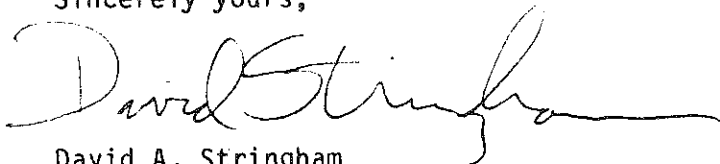
On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2 (or the State regulation equivalent).

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Please mail your response to the following:

RCRA Activities
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Sincerely yours,

A handwritten signature in cursive script, reading "David Stringham". The signature is written in dark ink and is positioned above the typed name and title.

David A. Stringham
Chief, Solid Waste Branch

Enclosure